

## ***Exhibit II***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants,

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

VIDEO-RECORDED  
DEPOSITION UPON ORAL  
EXAMINATION OF DELBERT  
HIEBERT

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Plaintiffs,

Cause No.  
CV 20-59-BLG-SPW

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants.

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**Delbert Hiebert**

1 direction in helping the judicial committee do  
2 that?

3 A. Well, there are Elder schools where we're  
4 helped to determine, for instance, whether --  
5 whether the wrongdoer is repentant, which might --  
6 it can change things. In certain cases, it can  
7 change to whether a person is disfellowshipped or  
8 whether he is reproved before the congregation  
9 where an announcement has been made that so-and-so  
10 has been reproved so that anybody who knew of this  
11 wrongdoer would know that he's been dealt with.

12 Q. And when you say that there are Elder  
13 schools, did you attend one?

14 A. Uh-huh. Several.

15 Q. And tell me, if you would, what were you  
16 told or taught about how to determine whether or  
17 not someone was repentant or truthful in their  
18 repentance?

19 A. Had they stopped, or were they still doing  
20 it. That's the main factor there. Have they made  
21 apologies, if that was necessary, to the one that  
22 they had done wrong to. Was there signs that they  
23 really truly were repentant over what they'd done.  
24 If there was no signs, then of course that  
25 determines the outcome too, you know.

**Delbert Hiebert**

1 Q. Anything else that you were taught in the  
2 Elder schools about judicial committees?

3 A. Well, the one real factor that is if  
4 there's any inclination that there is something  
5 illegal, that -- call the branch's legal department  
6 immediately. Don't go push ahead on your own  
7 without -- without direction from legal.

8 Q. Any of the Elder schools that you went to,  
9 did you learn how to speak with victims of a crime  
10 or alleged victims of a crime?

11 A. How to speak to them. I guess I really  
12 don't -- I don't recall. You know, they're -- yes,  
13 I remember one. There was a video. It was kind of  
14 like a reenactment type of thing, a scenario. This  
15 and thus happened, and so how would you respond to  
16 that. You know, like -- do you want to hear a for  
17 instance?

18 Q. Please, yeah, if you can give me the  
19 example. And when -- do you know approximately  
20 when the video that you're talking about, when you  
21 saw it and when it was made?

22 A. It's been since I was an Elder in the  
23 early 2000's. It was in Billings here at the  
24 Billings Heights Kingdom Hall.

25 And there was a video showing where, for